



From: [Sondra Bloomgren](#)
To: [scott@janklowabdallah.com](#); [mjackley@gpna.com](#); [ron@janklowabdallah.com](#)
Cc: [Cassidy Stalley](#); [Tom Fritz](#); [Jennifer Pravecek](#)
Subject: U.S. v Kilgallon, et al. -- Letter from CAS re SDTs
Date: Wednesday, September 29, 2021 4:26:00 PM
Attachments: [to Counsel re enc Subpoena Duces Tecums for cell phone records \(Houghtaling & Mosteller\).pdf](#)
[image001.jpg](#)

Dear Counsel:

On behalf of Attorney Cassidy M. Stalley, attached please find her latest correspondence and essential enclosures regarding the above-entitled matter.

Respectfully,



Sondra M. Bloomgren

Paralegal to Cassidy M. Stalley

Lynn, Jackson, Shultz & Lebrun, P.C.

P: (605) 342-2592

Direct Line: (605) 791-6487

F: (605) 342-5185

A: 909 Saint Joseph Street, Suite 800
Rapid City, SD 57701

W: [lynnjackson.com](#) **E:** [sbloomgren@lynnjackson.com](#)

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**LYNN
JACKSON**

ATTORNEYS

110 N. Minnesota Ave , Suite 400
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909 Saint Joseph Street, Suite 800
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Spearfish, SD 57783
Phone (605) 722-9000 • Fax (605) 722-9001

REPLY TO: Rapid City Office
From the offices of Cassidy M. Stalley
e-mail address: cstalley@lynnjackson.com
Sender's Direct Line: 605-791-6488

September 29, 2021

VIA E-MAIL ONLY (scott@janklowabdallah.com)

Mr. Scott A. Abdallah
Johnson, Janklow, Abdallah & Reiter LLP
101 South Main Avenue, Suite 100
PO Box 2348
Sioux Falls, SD 57101-2348

VIA E-MAIL ONLY (mjackley@gpna.com)

Mr. Marty J. Jackley
Gunderson, Palmer, Nelson & Ashmore, LLP
111 W. Capitol Avenue, Suite 230
Pierre, SD 57501

VIA E-MAIL ONLY (ron@janklowabdallah.com)

Mr. Ronald A. Parsons, Jr.
Johnson, Janklow, Abdallah & Reiter, LLP
PO Box 2348
Sioux Falls, SD 57101-2348

Re: U.S. v Kilgallon, et al.
Court File No. 1:21-cr-10023-BCB
Our File No. 210119-00001

Dear Counsel:

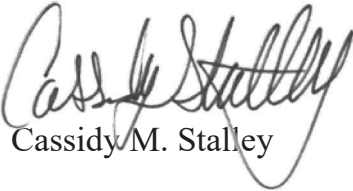
Enclosed please find the subpoenas that were served today regarding Mr. Houghtaling and Mr. Mosteller's cell phone records.

Mr. Scott A. Abdallah
Mr. Marty J. Jackley
Mr. Ronald A. Parsons, Jr.
September 29, 2021
Page 2

We will provide you with copies of the information we receive.

Sincerely,

LYNN, JACKSON, SHULTZ & LEBRUN, P.C.



Cassidy M. Stalley

CAS:smb
Enclosures

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHN KILGALLON, DANIEL C.
MOSTELLER and STEPHEN
HOUGHTALING,

Defendants.

Case No. 1:21-cr-10023-BCB

**SUBPOENA DUCES TECUM TO
VERIZON WIRELESS**

TO: Verizon
Attn: VSAT
180 Washington Valley Road
Bedminster, NJ 07921
Fax: 1.888.667.0028

You are hereby commanded and required to produce to the law offices of Lynn, Jackson, Shultz & Lebrun, P.C., 909 Saint Joseph Street, Suite 800, Rapid City, SD 57701, on or before October 13, 2021, by 5:00 p.m., the following named document now in your custody, under your control, or retained by your company and/ or agents or employees:

1. A list or report of all incoming and outgoing calls, call detail, text messages, picture detail, and internet sessions for cellular telephone number (605) [REDACTED], from March 1, 2021 to May 12, 2021, including the times of usage initiated and duration of use.

ISSUED this 29th day of day of September, 2021, on behalf of the Honorable Brian C. Buescher of the United States District Court, District of South Dakota, Northern Division.

Dated this 29th day of September, 2021.

LYNN, JACKSON, SHULTZ & LEBRUN, P.C.

By: /s/ Cassidy M. Stalley
Cassidy M. Stalley
Thomas G. Fritz
Special Prosecutor for the United States of
America
909 St. Joseph Street, Suite 800
Rapid City, SD 57701-3301
(605) 342-2592
cstalley@lynnjackson.com
tfritz@lynnjackson.com

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2021, I sent to:

Verizon
Attn: VSAT
180 Washington Valley Road
Bedminster, NJ 07921
Fax: 1.888.667.0028

by facsimile transmission, a true and correct copy of the **Subpoena Duces Tecum to Verizon Wireless** relative to the above-entitled matter.

The undersigned further certifies that on September 29, 2021, I caused the foregoing document to be served electronically via e-mail upon the following:

Mr. Ronald A. Parsons, Jr.
Johnson, Janklow, Abdallah & Reiter, LLP
PO Box 2348
Sioux Falls, SD 57101-2348
ron@janklowabdallah.com

Mr. Scott A. Abdallah
Johnson, Janklow, Abdallah & Reiter LLP
PO Box 2348
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scott@janklowabdallah.com

Mr. Marty J. Jackley
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LLP
111 W. Capitol Avenue, Suite 230
Pierre, SD 57501
mjackley@gpna.com

/s/ Cassidy M. Stalley
Cassidy M. Stalley

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
NORTHERN DIVISION

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vs.

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/s/ Cassidy M. Stalley
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